

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Ohio

United States of America

v.

Shemeric Cook a/k/a Woade

Case No.

3:16 MJ-111

FILED  
2016 MAY 27 AM 11:44  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
TOLEDO

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 12, 2016 in the county of Allen in the  
Northern District of Ohio - Western Division, the defendant(s) violated:

Code Section

Offense Description

Title 18, United States Code,  
Section 1591(d)

Obstructing a sex trafficking investigation

This criminal complaint is based on these facts:

See attached Affidavit in support.

☒ Continued on the attached sheet.

  
Complainant's signature

SA Alex Hunt (FBI)

Printed name and title

Sworn to before me and signed in my presence.

Date: 5/27/16

  
Judge's signature

City and state: Toledo, Ohio

Vernelis K. Armstrong - U.S. Magistrate Judge

Printed name and title

3:16 MJ 5141

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Alex Hunt, Federal Bureau of Investigation, first being duly sworn, depose and state as follows:

1. I am an "investigative or law enforcement officer of the United States" empowered to make arrests within the meaning of Title 18, United States Code, Section 3052 and to execute search warrants and conduct seizures within the meaning of Title 18, United States Code, Section 3107 for violations of the laws of the United States.
2. I am a duly appointed Special Agent, employed by the United States Department of Justice, Federal Bureau of Investigation (FBI). I have been a Special Agent with the FBI since 2015. I am currently assigned to the FBI Cleveland Division, Toledo Resident Agency. I was previously employed as a patrol officer for the Lilburn Police Department in Lilburn, Georgia from 2009 to 2011 and as a criminal investigator for the Gwinnett County Solicitor's Office in Lawrenceville, Georgia from 2011 to 2015. Since 2009, I have received training and have experience in interviewing and interrogation techniques, arrest procedures, search and seizure, search warrant applications, and various other crimes and investigation techniques.
3. This affidavit is submitted in support of a criminal complaint charging SHEMERIC COOK with obstructing, attempting to obstruct, interfering with and preventing the enforcement of Title 18, United States Code, Section 1591, in violation of Title 18, United States Code, Section 1591(d). All of the information contained in this affidavit is the result of either my own personal observations or investigation or has been provided to me by other law enforcement officers, each of whom I believe to be reliable. This affidavit contains information to establish probable cause for a criminal complaint. It is not intended to list each and every fact observed or known to me about this investigation.
4. On or about December 6, 2015, the Lima Police Department received information from a concerned citizen who advised of a possible runaway female from Columbus, Ohio residing at the Fourth Street Apartment complex in Lima, Ohio. The citizen was concerned about the safety of this minor female at that location because he/she had heard that the minor female was being prostituted out of the apartments.

*AHA*

3:16 MJ 5141

5. On or about December 9, 2015, the Lima Police Department verified with the apartment manager of the Fourth Street Apartments that a young female matching the description given by the concerned citizen had been seen at the apartments. Surveillance video of the minor female was viewed by officers that also matched the description given by the concerned citizen. Officers were also able to confirm that a 14 year old female, identified as AS, was listed as an active runaway from Toledo, Ohio.

6. AS was located a short time later and was brought to the Lima Police Department. During a subsequent interview, AS confirmed that she is originally from Columbus, Ohio and had been most recently placed in a foster care home in Toledo, Ohio. She admitted that she had run away from that placement and arrived in Lima, Ohio in early November 2015. AS had previously been in foster care in Lima, Ohio and during that earlier period had met individuals residing in the Fourth Street Apartments, including COOK. AS knew COOK by his nickname, "Woade."

7. AS reported that in November 2015 she lived with "Mouse" in the Fourth Street apartments in Lima. During that period, "Mouse" had her engage in commercial sex acts at several area locations, including at the Fourth Street apartments and at local gas stations. AS also reported that "Mouse" turned her over to Precious Russell, another resident of the Fourth Street apartments in Lima, Ohio, so that Russell could assist in having AS engage in commercial sex acts. Russell did so, and posted advertisements offering commercial sex acts by AS in the Lima, Ohio area.

8. AS also reported that in November 2015, she was taken to Fort Wayne, Indiana by a group including "Woade," "Mouse," "Scotch," "Tay," and "Lil' Ron." AS reported that Mouse told her that he would have her working, i.e. engaging in commercial sex acts, if "Zo" was in Fort Wayne. She reported that "Mouse" took her to the Motel 6 in Fort Wayne. "Zo" came to the motel, picked her up and took her to the Red Roof Inn in Fort Wayne where she engaged in commercial sex acts under his direction. I have since learned that "Zo" is Lorenzo Young, who regularly acts as a pimp to women engaging in commercial sex acts, both minors and adults.

9. A review of records for the Red Roof Inn in Fort Wayne, Indiana show that Young's girlfriend, Megan Hitt, rented a room at the Red Roof Inn from November 19, 2015 to November 23, 2015. In an interview with law enforcement agents on April 27, 2016, Hitt admitted that she was Young's girlfriend at the time, and that she and Young had rented a room at the Red Roof

Not

3:16 MJ 5141

Inn for purposes of engaging in and promoting commercial sex acts. Hitt also admitted that she and Young had posted AS online and prostituted her from that motel.

10. Records received from www.Backpage.com corroborate Hitt's statements. They show that there were several postings pertaining to AS in the "adult escorts" section of the Fort Wayne site on November 2015. Specifically, on November 21, 2015 there was a posting titled "Vanilla cupcake booty need's some frosting." Attached to that posting were pictures of AS engaging in sexually explicit conduct, as that phrase is defined in Title 18, United States Code, Section 2256. The website www.Backpage.com is a web-based advertisement service based in Arizona that is commonly used by pimps to promote prostitution activities.

11. On May 12, 2016, another law enforcement officer and I interviewed COOK. During that interview, it was clear that COOK understood that we were there as part of a federal investigation into the sex trafficking of AS, both out of the Fourth Street apartments and in Ft. Wayne during November and December 2015. I also advised COOK that I was a federal law enforcement agent, and that it was a federal offense to lie to a federal officer during an official investigation.

12. During the interview, I asked COOK if his nickname was "Woade." COOK expressly denied ever being known as "Woade," and denied ever hearing of anyone being addressed by that name. COOK specifically exclaimed, "Who's Woade?" I know that to be false and misleading conduct, as several other persons interviewed in this investigation, including Cook's brother Randy Thompson, have told me that COOK is known as "Woade" and have referred to him as "Woade." Moreover, COOK has a Facebook page under the name "Woade Badazz Cook."

13. During the interview COOK also specifically denied that he had ever been to Fort Wayne with his brother. I reminded COOK that it was a federal offense to lie to a federal agent, and COOK was also told that motel records showed that he had in fact been with Thompson in Fort Wayne at the time that AS was taken there for purposes of prostitution. COOK subsequently admitted that he had, in fact, gone to Fort Wayne with his brother and others in November 2015, and that AS was there at the time.

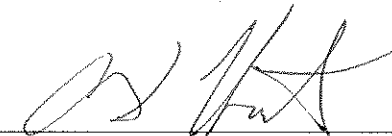
14. In addition, throughout the interview COOK engaged in misleading conduct by claiming not to know or not to recall the identities, names or nicknames of numerous people whose names were brought up during the interview. COOK stated that he only knew people by

*[Handwritten signature]*


3:16 MJ 5141

their "government names." Based upon interviews of several other persons in this investigation, including COOK's brother Randy Thompson, I know that to be untrue, and know that many of these individuals have nicknames and that COOK knows and uses these nicknames, such as "OG" (Maurice Reynolds), "Scotch" (Reynolds), "Mouse" (Thompson), "Lil' Ron" (Santwan Rocquemore) and "Tay" (Donta Jackson).

15. Based on the information contained herein, I believe probable cause exists that SHEMERIC COOK has violated Title 18, United States Code, Section 1591(d) by obstructing, attempting to obstruct, interfering with and preventing the enforcement of Title 18, United States Code, Section 1591.

X   
SA Alex Hunt, FBI

Subscribed and sworn before me this 27th day of May, 2016.

  
Vernelis K. Armstrong  
United States Magistrate Judge  
Northern District of Ohio – Western Division